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VIA ECFS

March 19, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Application of Qwest Corporation d/b/a CenturyLink QC Pursuant to 47 C.F.R.
§ 63.63 for the Emergency Impairment of Service; WC Docket No. 19-69

Dear Ms. Dortch:

On September 18, 2018, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) filed the above-referenced application for the emergency impairment of service in limited portions of the Florence, Colorado wire center primarily as a result of damage sustained from flooding in mid-July 2018 (“Application”).¹ CenturyLink has made filings to extend authority for this emergency impairment, and, by this letter, seeks a further extension of authority for an additional 60 days. CenturyLink has continued to explore options for service restoral and has kept the community informed and engaged in its efforts. However, in light of the substantial devastation in the region from this natural disaster as described in the Application, combined with the facts that the area is still very unstable with active landslides ongoing and severe winter weather has made construction infeasible, wireline telecommunications services have not been fully restored. Accordingly, pursuant to Section 63.63(b) of the Commission’s Rules, 47 C.F.R. § 63.63(b), CenturyLink respectfully requests an additional 60-day extension of the authority for the emergency impairment of service in limited portions of the Florence wire center.

As stated in the Application, CenturyLink is still unable to state what effect this impairment may have on rates in the area as it continues to evaluate options to restore service. CenturyLink previously supplied impacted customers with satellite phones for their use free-of-charge and has recently transitioned to providing these customers a subsidized offering from

¹ Prior to the establishment of a docket number for this matter, CenturyLink’s Application and filings to extend authority were submitted via the “Submit a Non-Docketed Filing” module of the Commission’s Electronic Comment Filing System pursuant to Sections 63.63(a), (b), 47 C.F.R. §§ 63.63(a), (b).

HughesNet.² CenturyLink is working with affected customers to help ensure a seamless transition to this new temporary service option.

In its Application and in the extensions previously filed, CenturyLink noted that the timing of service restoration would likely depend on the reconstruction of critical infrastructure in the area, namely County Road 386. As noted in those filings, the area is still experiencing landslides and is expected to be unstable for a prolonged period of time,³ putting this preferred option for restoral on a lengthy timeline, at best, if it is viable at all. Rugged, mountainous terrain and instability in the area make it infeasible to install temporary cable to provide service. Now, since the onset of severe winter weather in the area, any potential construction has been on hold until at least later in spring.

Other options will need to be pursued and CenturyLink continues its work with the Custer County Commissioners, Senator Cory Gardner's office, the Colorado Department of Transportation, and the United States Forest Service to explore alternatives. CenturyLink held stakeholder meetings in February 2019 with these and other entities that could contribute to a solution to provide service to affected customers; however, additional time is needed to finalize and implement a plan to restore service. Another meeting is currently scheduled for March 29, 2019. Options under consideration include state and federal broadband funding mechanisms to help defray the cost of rebuilding while also potentially enabling provision of broadband to this area and other neighboring underserved areas. CenturyLink will continue to coordinate with other stakeholders and will report additional information regarding service restoral within approximately the next 60 days as part of the emergency impairment filing process under Section 63.63.

In consultation with the FCC, CenturyLink was recently made aware of the requirement to file extensions of authority under Section 63.63(b) not later than 10 days prior to the expiration of such authority. CenturyLink respectfully requests a waiver of this requirement with respect to this and prior filings related to the impairment in the Florence, Colorado wire center. CenturyLink erroneously believed extensions under Section 63.63(b) needed to be filed before expiration of existing authority, rather than 10 days prior, and will seek any further extensions in accordance with the requirements and timelines set forth in Section 63.63(b).

² It is CenturyLink's intent not to charge affected customers for services during the outage period.

³ See Exhibit A to November 19, 2018 filing which is a summary of challenges related to rebuilding in the area prepared by the United States Forest Service.

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For the foregoing reasons, in light of the devastating flooding and continued construction challenges in the area, CenturyLink respectfully requests that the Commission approve a further 60-day extension of authority for the emergency impairment of service in limited portions of the Florence wire center.

Respectfully submitted,

**QWEST CORPORATION D/B/A
CENTURYLINK QC**

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